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May 31, 2024

Via ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: Chenming Holdings (Hong Kong) Limited v. John Does 1-10
Case No. 1:24-cv-00935-KPF

Dear Judge Failla:

This Firm represents Plaintiff Chenming Holdings (Hong Kong) Limited (“Plaintiff” or “Chenming”) in the above-captioned action. We write pursuant to the Court’s May 1, 2024 order (ECF No. 24) to provide an update on the status of all outstanding non-party discovery, and inform the Court of Plaintiff’s intent to file an Amended Complaint on or before June 28, 2024.

On May 16, 2024, Plaintiff received a supplemental document production from non-party Citibank, N.A. (“Citi”). As of the date of this letter, all three non-party banks have complied with the subpoenas served on them. On or about May 7, 2024, pursuant to the Court’s April 21 order (ECF No. 22), Plaintiff served two additional subpoenas; one each on Jaitegh Singh and Jurist IQ Corp. Plaintiff subsequently served courtesy copies of the subpoenas on Mr. Singh via email.¹ Mr. Singh responded on May 10, confirming receipt of the subpoenas and requested an extension of time to retain counsel. Plaintiff agreed to a two-week extension.

Based in-part on document discovery received from the three non-party banks, including the newly produced supplemental discovery from Citi, Plaintiff now believes that it has sufficient information to amend its Complaint and name Val Sklarov, Tetyana Sklarov, Jaitegh “JT” Singh, Jurist IQ Corp, Sierra Universal Corp, UPC Holdings Ltd, Lviv Estate Holdings Ltd, and C Vanderbilt Management Ltd. as defendants in this action. In light of Plaintiff’s investigation and the foregoing discovery, and because they will soon no longer be non-parties in this action, Plaintiff withdrew the subpoenas served on Jaitegh Singh and Jurist IQ Corp by email to Mr. Singh’s counsel on May 30, 2024. Plaintiff will seek discovery from putative defendants Jaitegh Singh and Jurist IQ in the normal course of fact discovery in this action. At this juncture, the non-party subpoenas so-ordered by the Court are all satisfied.

¹ Plaintiff served the Jurist IQ Corp subpoena on Mr. Singh because he is the Chief Executive Officer of Jurist IQ Corp and therefore authorized to receive service pursuant to CPLR §311(a)(1). Plaintiff also caused the subpoena to be issued upon Jurist IQ Corp at its registered business address as well as through the New York Secretary of State pursuant to N.Y. Bus. Corp. Law § 304(a).



Plaintiff is in the process of drafting the Amended Complaint in which it is considering alleging civil claims pursuant to the Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. §§ 1961-1968). Plaintiff expects to file the Amended Complaint prior to June 28, 2024.

Dated: May 31, 2024

Respectfully,

/s/ Vincent Filardo, Jr.

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Consistent with the above status update, Plaintiff shall file its amended complaint on or before **June 28, 2024**.

Dated: June 3, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading 'Katherine Polk Failla'.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE